



December 13, 2022

The Honorable Valerie Caproni  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

RE: United States vs. Ronald Glen Davis, 20-cr-603 (VEC)

Dear Judge Caproni:

I am the Mitigation Specialist currently working with Attorney Sabrina Shroff in her representation of Glen Davis. I am a licensed mental health counselor in Florida and New York and have been working with a forensic population for over 25 years in multiple jurisdictions. I have been working on this case since December 2021. Attorney Jill Shellow initially engaged my services when she was struggling to help Glen comprehend the gravity of the charges and gather his social history. When Glen was given new counsel, new counsel immediately recognized the need for a mitigation specialist and asked me to continue my work with Glen. I agreed and have worked with Glen and focused on attempting to understand his past and current functioning and assist him in processing the information imparted to him by his attorney.

In preparation for this report, I have reviewed media interviews and press reports about Glen's past, reviewed records and discovery, and conducted family interviews. I have met with and spoken to Glen on many, many occasions in person, on the phone and by video conferencing. Glen and I have discussed in depth his problems growing up, his relationship issues as well as his difficulties in managing daily life. We have also discussed his feelings of inadequacy, low self-esteem, and how significant depression and his learning deficits have played a role in his

ability to function independently. I have also consulted with and provided additional information to a defense retained expert, Dr. Elise Caccappolo who will document her findings separately. Disclosure of this memo is work product and was done in coordination with the attorney or record.

This letter is not intended to be a detailed life history but rather information intended to give the Court a better understanding of who Glen Davis is and how his disabilities have influenced his life and how he perceives the world.

### **Background**

Glen grew up in Baton Rouge, Louisiana. His family describes the neighborhood, Eden Park as “tough”. It was reported by the City of Baton Rouge that four neighborhoods accounted for 50% of the crime rate in Baton Rouge. Istrouma where his mother grew up and Eden Park where Glen grew up were two of the four. Glen has one older sister, Toya George, and one younger sister, LaJazzia Davis. Both his sisters are strong willed and were fighters in the literal sense growing up. The neighborhood they lived in required them to be tough and for many years, they were the ones that would fight for Glen as he was mercilessly picked on by the other kids. When he got big enough, they sent him to do the fighting hoping that his size would scare away the attacker. Glen has always done what he is told.

Glen was an awkward kid with no male role model in his life. He did not know his father as a child and that for a black child in Baton Rouge that was difficult. There was a single introduction in his teen years to a man, Donald Robertson, only to find out that was not his father later in life. This was especially cruel as Glen had been yearning for a father his entire life. Glen has a memory of a man who looked like him coming to his games driving a shiny blue Cadillac, John Grare. In his mind Glen believed this was his father but never had any contact with the man. His mother told him later that that John Grare was his father. He died of a heart attack 7 days after Glen first heard his name. To this day, Glen does not know if that person or some other person is his father.

His mother, Toyna Davis was a high school track star at Istrouma High School and model. Glen worshipped her. [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Glen has the last name Davis because his youngest sister's father, Donald Davis put his name on Glen's birth certificate, so that Glen would have a father. He had been Tonya's boyfriend for many years. Tonya followed this boyfriend to Edgewood, Maryland, when Glen was young. [REDACTED]

[REDACTED]. She was [REDACTED] and then in [REDACTED]

[REDACTED]  
[REDACTED]. His grandmother, Mozeanna George ultimately sent them home on a bus to Baton Rouge where he would be raised by his sister and grandmother. During his time in Maryland, Glen attended approximately six different schools because they were constantly moving. His mother served 2-3 years in prison and during that time Glen found it difficult to manage all the changes that came with having an addict for a mother. He became extremely anxious and would freeze when he felt anxiety overwhelm him. He began having episodes of bedwetting and nightmares that continued well into his teenage years.

When Glen was made to return to Louisiana, his grandmother put him into sports as she thought team sports would help his self-esteem. He was so large that rather than putting him in the pee wees, they put him in the seniors. Glen has always been "slow" and challenged by social situations so making friends did not come easily and certainly not those so much older than he. He looked older but he was mentally and emotionally very young. Unfortunately,

Glen's emotional age and his reactions to the older team members made it harder for him to be accepted.

Football was where he got his nickname "Big Baby" from Coach Earl. Coach Earl was the first person that ever paid any attention to Glen. It was this childhood coach that supported him and guided him in football but also mocked him for his overly emotional breakdowns. Glen began to gain self-confidence in his abilities and a growth spurt turned him into a real competitor. When he plays sports, he does not need to interact with people on a social level.

In Glen's teenage years it became clear that Glen could not be taken care of by his mother who continued to be plagued by cocaine addiction or his aging grandmother. Since he was a child, he has always needed help with every aspect of his life, school, feeding, shopping, and he would need help getting into sports.

His mother knew that Glen was a good athlete, but she also did not know what to do. Along came Collis Temple; Collis was experienced in basketball. He was the 1<sup>st</sup> black player to play for LSU in 1971 and he also played in the NBA. He was a coach at the time Glen met him. Glen played against his son's school team and after the game Collis approached Glen to play on his team. He was a good mentor for Glen professionally. Glen played with Collis's team, Sport's Academy Cubs from the age of 12-17. Collis, cognizant of Glen's talent, wanted to take Glen into his home.

Glen resisted going to live with the Collis family, but he knew that if he did not, he was destined for the streets. School was hard for Glen, and he did all he could to avoid things that evoked anxiety in him. He was good at basketball, in demand, the best player locally, so from 8<sup>th</sup> grade on, and school was something that he had to get through so that he could play ball. While other children are evaluated and placed appropriately for educational needs, the focus with Glen was what do we need to do to keep Glen on the basketball court. No one wanted to take the time to educate Glen; just get him the time and grade he needed so that he could play. Glen would regularly get more than "assistance" with testing and homework. His grades and

testing became nothing more than a work of fiction through college. He was a theater major in college.

By the summer of 2001 Glen's basketball career started to take off. He went to basketball camp at LSU. With basketball came friends, attention, and financial independence. It also came with handlers, agents, accountants, contracts, and the never-ending line of family and friends with their constant ask for hands out. People who had never stepped forward, now all had a soft spot for Glen. Glen was managed, he was told what to do, how to eat, how much to weigh and where to be but not taught anything – and certainly not taught how to plan for a future.

Worse yet in every intimate relationship the question of motivation always remained. Was he really loved or was it the money and fame that kept the relationship going. From his mother to his sister to his manager – each has been there when Glen had money; never before and never after.

Glen had one significant relationship with Eugenia Gomez that resulted in the birth of Amari Davis who is currently 12 years old and resides in Florida. Glen met Eugenia when he was in the NBA during his first year with the Celtics. She was pregnant before they were married. They were married for 1 year but were separated within six months of the marriage. Glen has tried to maintain contact with his daughter but his relationship with his ex-wife remains contentious over money and his daughter has rejected his efforts.

Being managed by others worked for Glen until the money ran out. He broke his ankle playing in 2012 and then broke the same foot in 2015. That was the end of his basketball career. He was left with little money and even fewer opportunities. Then all the people that managed Glen disappeared as did the friends and even some family. Glen is malleable and he blindly trusted most people.

## **Conclusion**

Glen is in the borderline range of intellect according to his most recent testing. It is not necessary to have formal testing to recognize Glen's deficits. In speaking with him it is obvious that he has difficulty with abstract thinking, problem solving and planning. His thought processes and how he approaches problems are childlike and short visioned. He has difficulty with everyday tasks such as managing appointments, managing his finances and reading/comprehending documents.

Glen has not mastered the ability to mask his inabilities in the everyday world because he has never really been independent in his lifetime. He also is surrounded by a more educated community. Additionally, Glen's inability to mask his deficits is in part due to his emotional responses. His way of addressing his frustrations is to sob uncontrollably, at times falling to the floor overwhelmed by anxiety.

It was not difficult to build trust with Glen as he is overly trusting of everyone in his life. That has made him a victim more often than most. He has been repeatedly scammed in business and personal matters which is not surprising. His trusting nature makes him particularly vulnerable to being taken advantage of. He was cared for by his grandmother, sister, coaches and managers and agents until just prior to the inception of this case. His sister still does her best to help from a distance. Glen himself is trying to learn and trying to start over.

It is my belief that Glen has tried his best during his lifetime to function in a way that is acceptable to community standards. Whether it is fortunate or unfortunate, from the age of 14, he was groomed to become a talent and fell through the cracks when it came to teaching him life skills. What was best for him was what was best for the teams that he played for. Children and adults with deficits and limited intellectual functioning can be taught skills and Glen was taught a skill and was very successful. Now he needs to learn new skills.

As the man that stands before you today, Glen is not able to walk off and blend into the community. He is still an oddity because of his past fame, intellect, and size (6' 8', 360 lbs.) he

is often a distraction in the streets. He is not able to easily fit into the everyday world that most of us live in. That has not stopped him from trying to reinvent himself. His desire to learn new skills has allowed him to market himself and take small jobs, give interviews, and play small parts in movies and television. Glen has no ego. He is willing to work hard to get back on his feet.

Glen has come to realize that he did not get the help he needed or the guidance off the Court. It has been a hard lesson to learn and very emotional for him. He spent most of his life with people cheering him on which led him to a false sense of security in all aspects of his life. It was only when all the cheers were gone and he lost his home, his car, his career and financial independence did he realize he really knew very little. Glen does not want that to happen to any other kid. He has always been active in the at-risk youth community and easily relates to children.

He started a foundation in 2011 Glen Big Baby Davis Foundation helping at risk youth, more recently he has participated in Never Stop Grinding Foundation a program for at risk youth that work hand and hand with law enforcement in California. Glen knows he has a connection to these kids and believes he can guide them off the streets. He can provide a productive influential mentor to youth.

Glen Davis is easily exploited. He is vulnerable to pressures. Not only was he not taught life skills but also has no street skills. Glen will have a lifetime of struggles, but he can be successful with proper programming and support. He can be an influential asset to the community. He needs the opportunity to receive therapeutic and educational interventions that he never received.

Sincerely,

Lisa McDermott  
Mitigation Specialist

